

CALIFORNIA CIVIL RIGHTS LAW GROUP

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DEMETRIC DI-AZ and OWEN DIAZ

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

DEMETRIC DI-AZ, OWEN DIAZ, and
LAMAR PATTERSON,

Plaintiffs,

v.

TESLA, INC. dba TESLA MOTORS, INC.;
CITISTAFF SOLUTIONS, INC.; WEST
VALLEY STAFFING GROUP;
CHARTWELL STAFFING SERVICES, INC.;
and DOES 1-50, inclusive,

Defendants.

Case No. 3:17-cv-06748-WHO

**PLAINTIFFS' ADMINISTRATIVE
MOTION TO FILE DOCUMENTS
UNDER SEAL IN SUPPORT OF
PLAINTIFFS' OPPOSITION TO
DEFENDANT NEXTSOURCE, INC.'S
MOTION FOR SUMMARY JUDGMENT**

Date: December 18, 2019

Time: 2:00 p.m.

Courtroom: 2, 17th Floor

Judge: Hon. William H. Orrick

Trial Date: March 2, 2020

Complaint filed: October 16, 2017

MOTION

Pursuant to Local Rules 7-11 and 79-5, as well as Judge Orrick's Standing Order regarding administrative motions to seal, Plaintiffs Demetric Di-az and Owen Diaz respectfully request an order sealing the physical copies in the Court's files of Exhibits A through Y to the Supplemental Declaration of Lawrence Organ in Support of Plaintiffs' Opposition to Defendant nextSource, Inc.'s Motion for Summary Judgment. This Motion is based on the Declaration of Lawrence Organ in support thereof, and the documents to be sealed are laid out below:

Document	Designating Party	Basis for Sealing
Exhibit A: NS000004	nextSource, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit B: Deposition of Plaintiff Owen Diaz	nextSource, Inc.; Tesla, Inc.; and Citistaff Solutions, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit C: NS000175 to NS000178	nextSource, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit D: TESLA-0001014 to TESLA-0001050	Tesla, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit E: TESLA-0000667 to TESLA-0000671	Tesla, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit F: TESLA-0000333	Tesla, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit G: NS000108 to NS000111	nextSource, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit H: NS000095 to NS000100	nextSource, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit I: TESLA-0000510	Tesla, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit J: TESLA-0000511	Tesla, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit K: TESLA-0000314 to TESLA-0000316	Tesla, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit L: Deposition of Demetric Di-Az	Tesla, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit M: Deposition of Lamar Patterson	Tesla, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit N: TESLA-0001003 to TESLA-0001005	Tesla, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).

Exhibit O: TESLA-0000060	Tesla, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit P: TESLA-0000626	Tesla, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit Q: NS000138 to NS000139	nextSource, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit R: CITISTAFF-0000050 to CITISTAFF-0000055	Citistaff Solutions, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit S: NS000038 to NS000045	nextSource, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit T: NS000095 to NS000100	nextSource, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit U: NS000014	nextSource, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit V: CITISTAFF-0000009 to CITISTAFF-0000010	Citistaff Solutions, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit W: TESLA-0000321 to TESLA-0000323	Tesla, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit X: TESLA-0000317	Tesla, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit Y: TESLA-0000905	Tesla, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).

Publicizing these documents would violate the Protective Order entered in this case [Dkt. No. 50].

DATED: November 19, 2019

By: /s Lawrence Organ
 Lawrence A. Organ, Esq.
 Navruz Avloni, Esq.
 J. Bernard Alexander, Esq.
 Attorneys for Plaintiffs
 DEMETRIC DI-AZ AND OWEN DIAZ